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JAN 14 2005

Manufacturer of Premium Botanical Extracts and Liquid Phyto-Caps™

Division of Compliance and Enforcement/ONPLDS
Center for Food Safety and Applied Nutrition
Food and Drug Administration
HFS-810
5100 Paint Branch Parkway
College Park, Maryland 20740

January 6, 2005

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of new products and/or changes to product names and structure function claims.

New Product and S/F Claim:

Cinnamon Bark Supports Healthy Blood Sugar Metabolism

Name or S/F Change:

Holy Basil: Maintains Healthy Cortisol Levels and Promotes Feeling of Emotional Well Being and Promotes COX-2 Modulation

Para-Shield: Supports Healthy Intestinal Environment

We have selected the names and structure function claims to not make or imply a disease claim and meet the requirements of 21 U.S.C. 343(r)(6)

Please call at 828-883-5938 if you need additional information or if you have any questions.

Sincerely,

James A. Grant
Regulatory Compliance Officer

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